

Mary A. Boyd VP, Regulatory & Government Affairs

**Safety Services** 

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August 22, 2016

EX PARTE NOTICE

## **VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street SW Washington, DC 20554

Re: Amendments to Part 4 of the Commission's Rules Concerning Disruptions

to Communications, et.al., PS Docket Nos. 15-80, 11-82, ET Docket No. 04-35, Report and Order, Order on Reconsideration, and Further Notice of

Proposed Rulemaking, 31 FCC Rcd 5817 (2016)

## Dear Ms. Dortch:

Pursuant to Section 1.1206(b) of the Commission's rules, this letter will confirm that on Thursday, August 18, 2016, the undersigned and Mike Nelson of West Safety Services, Inc. ("West Safety") (f/k/a Intrado Inc.) met with Jeffrey Goldthorp, Brenda Villanueva, Joseph Schlingbaum, Peter Shroyer, Marcus Brown, John Healy and Dana Zelman of the Public Safety and Homeland Security Bureau.

The purpose of the meeting was to discuss the Further Notice of Proposed Rulemaking (*FNPRM*) in the above-referenced proceeding and the Commission's goal stated therein to have visibility into the networks of all providers supporting Emergency Services IP network (ESINet) services. Specifically, West Safety discussed (i) its obligations under existing Part 4 outage reporting requirements, (ii) the intent of the pending *FNPRM* as it relates to outage situations where the Commission could gain knowledge and insight from interconnected services, (iii) the services provided by Internet backbone providers and (iv) the proposal to share Network Outage Reporting System (NORS) data with state governments and the compelling need to protect this confidential information from unauthorized disclosure or use.

West Safety, utilizing the attached National Emergency Number Association (NENA) i3 architecture diagram, also discussed its ESINet redundancy and resiliency architecture design at a high-level without disclosing any confidential contractual information or specific service level terms with interconnection providers. In addition, West Safety provided insight into the complexities presented by multi-vendor relationships within ESINets and encouraged the Bureau to reach out to 911 authorities engaged in ESINet deployment initiatives.

West Safety appreciates the opportunity to meet with the Public Safety and Homeland Security Bureau. Should you have any questions, please do not hesitate to contact me.

Respectfully submitted,

/s/Mary A. Boyd

Mary A. Boyd VP, Regulatory and Government Affairs West Safety Services, Inc.

cc: Jeffery Goldthorp

Brenda Villanueva Joseph Schlingbaum Peter Shroyer Marcus Brown John Healy

Dana Zelman

